

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C.

In the Matter of:	)	
	)	
Delete, Delete, Delete	)	GN Docket No. 25-133
	)	
	)	DA-25-133
To the Commission	)	

COMMENTS OF SAM BROWN

Some of the ideas discussed in this proceeding mentioned the elimination of expiry for amateur radio licenses. This is good idea but does not go far enough.

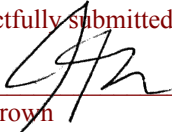
Consider broadcast licenses. Every eight years, radio and TV stations must announce a pending renewal. They then complete paperwork, and submit it to the Commission for approval. In some cases people who do not like these broadcasts or broadcasters object, triggering even more paperwork and time on the part of the broadcasters and the Commission.

As a practical matter, broadcast licenses are almost always renewed. In the rare cases where this has been delayed or denied, the violations were sufficiently egregious that the license could be revoked rather than non-renewed. I have never heard of a situation where faults of a licensee could not trigger revocation but could result in a renewal being denied. If you think about it in those terms, the renewal is an unnecessary administrative burden for both broadcasters and the Commission.

Thus, the logical approach is to delete the renewal process. There is no benefit from it. This should also be considered across other license types, and implemented where appropriate.

It is my hope that you find this helpful...

Respectfully submitted,



Sam Brown
Independent Broadcast Consultant